

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MEDLINE INDUSTRIES, LP

Plaintiff

v.

**VISTA COMMUNITY MEDICAL CENTER
LLP d/b/a Surgery Specialty Hospitals of
America**

Defendant

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CASE NO. 1: 25-7163

**DEFENDANT’S STATUS REPORT
REGARDING JURISDICTIONAL DISCOVERY**

Defendant, Vista Community Medical Center LLP, files this Status Report and states as follows:

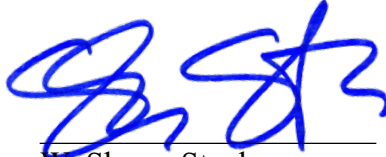
On August 28, 2025 the Court entered an order permitting the Defendant to conduct limited written jurisdictional discovery. The Plaintiff voluntarily supplied seven redacted responsive documents comprising 56 pages consisting of limited partnership agreements and amendments to such limited partnership agreements. Defendant also served a document subpoena on Plaintiff’s affiliate, TC Group VII, L.P., in response to which three additional documents were received—two limited partnership agreements comprising 23 pages and an investment prospectus comprising 422 pages.

The documents produced do illustrate a rather uncertain chain of limited partnerships, some of which comport with the information provided in the Liberman declaration (Doc. 10-1), but they are certainly not conclusive in that regard.

More concerning is that the documents produced do not even remotely “verify the status of the alleged non-diverse limited partner,” (Doc. 18) and Defendant questions

whether Plaintiff or its third-party associates can ever produce such documentation. The produced documents make no mention of the alleged non-diverse individual or in any other way identify or even imply the existence of a partner that is a non-diverse individual or corporation. Nevertheless, given the amount in controversy and the other circumstances of this case, to avoid a situation where the tail is wagging the dog, Defendant stipulates that it is unopposed to remand of this case.

Respectfully submitted,



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For the Defendant,

Vista Community Medical Center